

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

TODD WOLF,

Plaintiff,

Case No.: 23-cv-149

v.

CITY OF SHEBOYGAN, MAYOR RYAN SORENSON in his individual and official capacity, CITY ATTORNEY CHARLES ADAMS in his individual and official capacity, ALDERWOMAN BARBARA FELDE, in her individual and official capacity, ALDERWOMAN ROBERTA FILICKYPENESKI, in her individual and official capacity, ALDERWOMAN AMANDA SALAZAR, in her individual and official capacity, ALDERWOMAN ANGELA RAMEY, in her individual and official capacity, ALDERWOMAN BETTY ACKLEY, in her individual and official capacity, ALDERMAN ZACHARY RUST, in his individual and official capacity, ALDERMAN DEAN DEKKER, in his individual and official capacity, ALDERWOMAN GRAZIA PERRELLA, in her individual and official capacity, PRESIDENT SHEBOYGAN AREA SCHOOL DISTRICT MARY LYNNE DONOHUE, in her individual capacity; MAYA HILTY; and JILL HALL,

Defendants.

DEFENDANTS' PRIVILEGE LOG

DATE	DESCRIPTION	PRIVILEGE ASSERTED
	All von Briesen & Roper s.c invoices for legal services relating to the investigation or any issue related to this litigation.	Attorney/Client Attorney Work Product Prepared in anticipation of litigation

8/22/2022 – present	Any email communications or related documents to/from City Attorney Adams or anyone in the City Attorney’s office, to/from Mayor Sorenson, Common Council members and/or outside counsel that concerns any issue in the case.	Attorney /Client Attorney Work Product Prepared in anticipation of litigation
8/22/2022 – present	Any material created by City Attorney Adams or anyone in the City Attorney’s office that concerns any issue in the case.	Attorney /Client Attorney Work Product Prepared in anticipation of litigation
10/17/2022 - present	Closed session minutes Any material created by outside counsel provided to or otherwise used or referred to in any closed session. Any notes or other documents created by any City employee or official relating to any closed session.	Attorney /Client Attorney Work Product Prepared in anticipation of litigation
11/8/2022 – present	Any communications to/from and documents provided by City Attorney Adams (or members of the City Attorney’s office) to Jill Hall, James Macy or anyone in the von Briesen & Roper law firm relating to Jill Hall’s investigation or any issue related to this litigation.	Attorney/Client Attorney Work Product Prepared in anticipation of litigation
11/8/2022 – present	Any communications to/from or document provided by any City employee or official to Jill Hall or anyone in the von Briesen & Roper law firm relating to her investigation or any issue related to this litigation.	Attorney /Client Attorney Work Product Prepared in anticipation of litigation
11/8/2022 – present	Any communications, documents or other tangible thing relating to the investigation completed by Jill Hall, including but not limited to all written reports.	Attorney /Client Attorney Work Product Prepared in anticipation of litigation
2/15/2023 – present	Any email communications to/from MWH Law Group, including all staff of MWH that relate to any issue in this litigation.	Attorney /Client Attorney Work Product

2/15/2023 – present	Other than final drafts of documents filed with the Court or served on Plaintiff's counsel, any material created by MWH, including all staff of MWH, regarding any issue in the case, including but not limited to, investigation materials, notes, draft documents.	Attorney /Client Attorney Work Product
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*This log has been prepared prior to the completion of Defendants' investigation, discovery, and preparation for trial in this action. City of Sheboygan Defendants reserve the right to amend this log as needed and will update this log as necessary. This log is for purpose of discovery only and is not an admission or acceptance that any matter is relevant and/or admissible into evidence. Any failure to include any document on this log does not constitute waiver of any privilege. This log does not list any privileged advice memoranda, internal communications, or other documents to or from any Defendants' counsel, including without limitation the working files of any Defendants' counsel.

Dated this 12th day of January, 2024.

MWH LAW GROUP LLP

Attorneys for Defendants City of Sheboygan, Mayor Ryan Sorenson, City Attorney Charles Adams, Alderperson Betty Ackley, Alderperson Dean Dekker, Alderperson Barbara Felde, Alderperson Roberta Filicky-Peneski, Alderperson Grazia Perrella, Alderperson Angela Ramey, Alderperson Zachary Rust, Alderperson Amanda Salazar, and President of Sheboygan Area School District Mary Lynne Donohue

By: /s/ Electronically signed by Warren E. Buliox

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